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Safer Journeys
Ministry of Transport
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Proposals for the 2020 Road Safety Strategy 'Safer Journeys' Submission from TRAFINZ

Thank you for the opportunity for TRAFINZ to assist in the development of a Road Safety Strategy for the upcoming decade to 2020.

We are happy to continue to work with the Ministry to develop an effective Strategy.

TRAFINZ comments are informed by the input of leading road safety professionals from around New Zealand and from overseas. They are also informed by a survey of delegates at our recent (September 2009) conference.

About TRAFINZ

TRAFINZ (The New Zealand Traffic Institute) represents a wide grouping of New Zealand local authorities, covering the majority of the New Zealand population. Its membership includes regional councils, the major metropolitan cities and smaller provincial authorities as well as private sector, Police, government agencies and non local government members.

TRAFINZ' Executive is comprised of elected councillors and practitioners, drawn from a cross section of the public and private sector membership, together with senior personnel representing its key government partners. It is supported by a nation wide Technical Committee of senior technical staff from transport consultancies, local government, Police and educators that volunteer their services *pro bono*. This year TRAFINZ ran its 61st Annual conference.

The Institute's primary focus is on sustainable, safe transportation planning, traffic management and road safety. We seek to get more from our transport system by supporting local authorities and enabling local people to resolve local problems. TRAFINZ provides specialist advice to member authorities on traffic and safety issues by drawing from the depth of expertise available through its members and its strong international network of transport professional, extensive scientific research

and information networks. It also acts as a conduit for local authorities to respond to the Government on new transport policies and legislation.

Failure to achieve 2010 Road Safety Strategy Targets

TRAFINZ strongly supported what was world leading work in 2001. Sadly we as a nation have failed to make real progress and have clearly been overtaken in our road safety and sustainable transport performance by many other countries. TRAFINZ predicted this outcome and attempted via various government administrations, government agencies and bodies to identify the key failings in delivering the Strategy.

In 2005, alarmed at the lack of progress, and the then Transport Safety Minister's plea to 'be given permission' to implement more challenging safety initiatives, TRAFINZ undertook a European Fact Finding Tour of the world's best performing countries. The team undertook 55 interviews with leading safe and sustainable transportation specialists in four countries. Our aim was not merely to find out what they did, but how they were able to do it – the culture and structures.

The TRAFINZ team returned to NZ, providing large quantities of information and documents to Government and its agencies collaboratively. TRAFINZ also undertook a series of presentations to Government Agencies, industry, Local Government Mayors, the NRSC, and the 2005 TRAFINZ conference. In particular we recommended:

- An agreed Vision - Trafinz suggested “*That none of us should be killed or seriously injured with the NZ transportation system*”
- Establish an ‘Independent transport safety champion’
- Eliminate the ‘*blame culture*’ - as this is dismissive behaviour and will never lead to achievement of goals and objectives
- Focus transport delivery on the basis of scientific facts
- Create a safety culture
- Provide the tools to align with desired outcomes – quality vehicles, infrastructure and people
- The need for *incremental and continuous improvement* that align to the vision
- Developing a Transport system that obtains more out of the transport (especially vehicular) infrastructure we currently have through appropriate intelligent traffic management while investing in active infrastructure and where appropriate mass transit passenger transport and freight movement.

Unfortunately despite extensive efforts, and later confirmation from Government's review expert, Jeanne Breen, these recommendations have still not been taken up. New Zealand still lacks an empowering safety vision, no independent champion has yet been enabled by Government, and most of the known delivery tools remain unimplemented.

The 2010 Strategy was a world leading piece of work and analysis. It predicted the savings in deaths and injuries that would result from a wide range of interventions. The sad fact is that we as a nation have not shown sufficient courage and leadership to implement its recommendations. The brutal result is unnecessary death and injury on our roads.

The aim of the current 2010 Road Safety Strategy was to have no more than 300 deaths and 4500 hospitalisations a year. It is clear that those targets will not be achieved, just as TRAFINZ has said for several years.

Death rates have fluctuated through the last few years reaching at best around 400 deaths per annum average. Serious injuries have increased consistently since 2000 as we get better at saving the critically injured. The year to date (30 Sept) records show that twenty five more people have been needlessly killed this year than at the same time last year. We are on track to kill 420 – 430 people this calendar year.

The cost of road trauma to us as a nation has been assessed, by government at some \$4.5 billion for the last available year (2008). This significantly exceeds the cost of congestion. The last cost TRAFINZ saw for congestion was in the order of \$1 billion nationally per annum. It also represents around 2% of Gross National Income and around \$1000 per New Zealander. However proportionately we direct very little of our transport budget towards improving safety. It is usually only a side benefit of major roading projects. Continuing this balance of investment is neither economically rational, nor ethically supportable. Reducing the level of death and injury, and associated lost productivity, traffic delays, health costs, would substantially support Government's economic drive.

In developing a Strategy for the upcoming 10 years a review of the reasons for the failure to achieve the 2010 Strategy would be wise. TRAFINZ considers the answers fairly self evident. In the last ten years we have as a nation failed to take up many of the known and scientifically proven, known solutions which were recommended in the 2010 Strategy. Not surprisingly then the level of road trauma, both death and injury, has not come down as was intended. This means that real people are dying or suffering often permanent injuries when those charged with responsibility for delivering transport safety know that this could be avoided. It means thousands of friends and family suffer as a result. It is largely a lack of political leadership and commitment that have been the barriers to saving lives and preventing injury.

Overview of 2020 Road Safety Discussion Document, 'Safer Journeys'. Vision, Systems Approach and Targets

1. Vision

TRAFINZ strongly supports the value of an inspiring empowering **transport safety vision**. Our experience from leading European nations is that such a vision has great power to motivate individuals, corporates, and Government agencies to act and to make a difference. The vision wording is obviously important. We don't consider the wording proposed in Safer Journeys to be adequate. The Swedish Vision Zero wording 'That nobody obeying the road rules will be killed or seriously injured' is much more compelling. The vision should inspire action and belief. It should be ethically inspired. Irrespective of how practically challenging a high vision statement may be, it remains necessary as an aspirational condition.

2. Targets

TRAFINZ strongly recommends that **targets** be included alongside the vision. We understand the argument that targets should only be set following decisions on which initiatives will be adopted. However TRAFINZ view is that Government should adopt all the initiatives which will make significant difference, with the aim of adopting as low a target as possible. TRAFINZ also advocates that part term targets (eg 3, 5 years) should be set. Targets are a vitally important accountability discipline.

There is a need for active monitoring of the Strategy with a view to keeping it on track. While the 2010 strategy was comprehensively reviewed mid term (the Jean Breen review and 'See you there – safe as' consultation) little progress resulted as recommendations were not taken up. We must not as a nation get to the end of another 10 year strategy and have failed to achieve its goals. This will probably mean either some consistently reducing targets across the decade, or assessing actual death and injury rates and requiring extra urgency if sufficient progress is not being made.

3. Systems

TRAFINZ also welcomes the **systems** approach proposed. This is world best practice. New Zealand's traditional approach has been to 'blame the driver' for crashes. Consequently statistics are collected principally on the basis of categories of driver error, and it appears that crash analysis is too often done on the basis of considering prosecution rather than for the purpose of avoiding repeat crashes. While the vast majority of crashes involve human error, the systems approach acknowledges the responsibility of 'system owners', road controlling authorities, lawmakers, fleet purchasers, insurers, politicians, police, car manufacturers etc. System owners can dramatically reduce the risk of and severity of crashes.

A systems approach acknowledges shared responsibility, and as the discussion document rightly notes 'human error is inevitable' and 'ordinary people make mistakes'. It also acknowledges human tolerance for trauma, and creates speed and road conditions so human beings can survive crashes. Therefore philosophically the system should be designed such that the inevitable error is not punished by death or serious injury. Designing a safer system is a better bet than hoping to design safer humans. TRAFINZ strongly supports the proposed systems approach. It is critical in making progress.

A key element of a systems approach is providing safe infrastructure. TRAFINZ is delighted to see the focus put on '**safer roads and roadsides.**' This is critical to reducing road death and injury.

Therefore we welcome the systems approach and inclusion of a vision in the initial 2020 documentation. This is a breath of fresh air. TRAFINZ also strongly supports inclusion of targets to support the vision.

Obviously actions will be required to achieve the vision and targets.

- We make the following specific comments and suggestions regarding the proposed initiatives.
- We also recommend a number of other actions.
- We note the Minister's comments that Government is unlikely to implement all the 60 odd initiatives. However while there are a few which are clearly alternatives for each other, TRAFINZ view is that almost **all** would assist in reducing road trauma, and the more initiatives that are implemented the better.
- Our submission focuses on what we consider the priorities should be.

TRAFINZ top fifteen interventions

1. Funding

TRAFINZ considers that a greater proportion of investment in roading should be targeted primarily at safety rather than capacity. A review of funding assistance rates is needed to encourage the achievement of safety goals. Examples include the level of assistance for initiatives directed at vulnerable road users such as walking and cycling. There is also concern that local roads' safety performance may be lagging because many authorities cannot invest sufficiently. This is critical as approximately 85% of the total roading length in New Zealand is local roading. The cost of death and injury on local roads often exceeds that on state highways. For example in 2007 in the Wellington region 73% of all road injuries occurred on local roads, and 30% of road casualties were pedestrians and cyclists. It may be appropriate to require road safety action plans from all the system's owners. This will probably need appropriate funding support. The level of funding and priority in the GPS needs to be appropriate for delivering the vision and outcomes over the 10 years of this Safety Strategy. TRAFINZ specifically recommends that revenue from safety camera offences be invested directly into road safety. This would fully hypothecate such revenue, just as road user/fuel excise is now fully hypothecated.

2. Establish an Independent Road Safety Champion

TRAFINZ is strongly of the view that **progress** in road safety **needs champions**. They can be political, or community, and ideally both. France's road toll dropped dramatically when then President Chirac decided to champion road safety. Equally community support is important to empowering politicians and decision makers, and winning the public discussion. Examples in other fields in New Zealand have included ASH and ALAC.

In our review of the 2010 Strategy, we believe that the lack of a consistent person or group(s) to champion the progress of the strategy led to the targets not being met. In our review of European nations that are making progress towards better road safety, the independence of their champion was the single consistent

factor. Government agencies cannot be independent champions for obvious reasons.

New Zealand has neither the appropriately resourced community safety champion, nor to date the political champion. TRAFINZ has studied international examples and subsequently advocated for several years for an independent road safety champion organisation with the resources to collect and occasionally conduct research, and to be a public advocate.

We believe very strongly that there is an opportunity for strong leadership in this area and for a bi-partisan approach to be taken by Parliament for the establishment of an independent road safety champion organisation, funded at least in part by Parliament. This could be an NGO or perhaps take a Parliamentary Commission form. We see these political and community champions being essential to developing a road safety culture in New Zealand. We consider this could be delivered for less than \$1 million per annum.

3. Driver Licensing

Raise the Driving Age. TRAFINZ strongly recommends the need to improve the quality of New Zealand drivers. We recommend raising the driving age. Without exception every international expert TRAFINZ has discussed the driving age with over the years considers New Zealand's 15 year driving age to be 'crazy'. At a minimum it should be raised to 16, commensurate with the school leaving age. We recommend that it be increased further to 17 or 18. Understanding the needs of the rural community, a special licence arrangement could be developed, rather than impose the same lower level across the vast majority of the population who neither need it, nor for whom it is desirable.

Lift Driver Licensing Standards. TRAFINZ strongly recommends that obtaining a licence become more rigorous. This should include requiring logged supervision (the 120 hours suggested in the discussion document). It also includes a longer learner licence period, and encouraging or requiring some professional driver training. Swedish evidence indicates the degree that increasing driver training has in reducing risk. 18 months experience lowers risk by 300% over 6 months. In NZ we average just 25 hours practice and no professional training, and 80% of young drivers pass the test. The UK has a pass rate of just 50% and a much harder training regime. There will be a multitude of factors affecting relative levels of road trauma, but it is worth mention that the British per capita death rate is just 40% of ours. The licence requirement should also focus on hazard awareness especially with regard to awareness of vulnerable users. Ideally all prospective drivers should be pedestrians and cyclists and show understanding of vulnerable road users before they get behind the wheel.

10 Year Driver Retesting. TRAFINZ also suggests that consideration be given to periodic retesting of drivers. At present we record roughly 90% of crashes have a driver error component, but only around 6% have a vehicle related component. However we currently retest vehicles every 6 or 12 months

depending on age, but do not retest drivers at all, despite having such a weak initial licensing system.

Very few long standing drivers remain familiar with the road code, poor driver behaviours persist, and reminders would do no harm. It is worth considering some rebalancing of the testing frequency for vehicles and for drivers. The AA's surveys indicate an impossible 86% of drivers consider they are better than average, and yet 2/3rds of crashes involve just a single vehicle! Clearly we have a lot of overconfident under skilled drivers. We suggest that 10 yearly retesting of drivers would help improve driver quality.

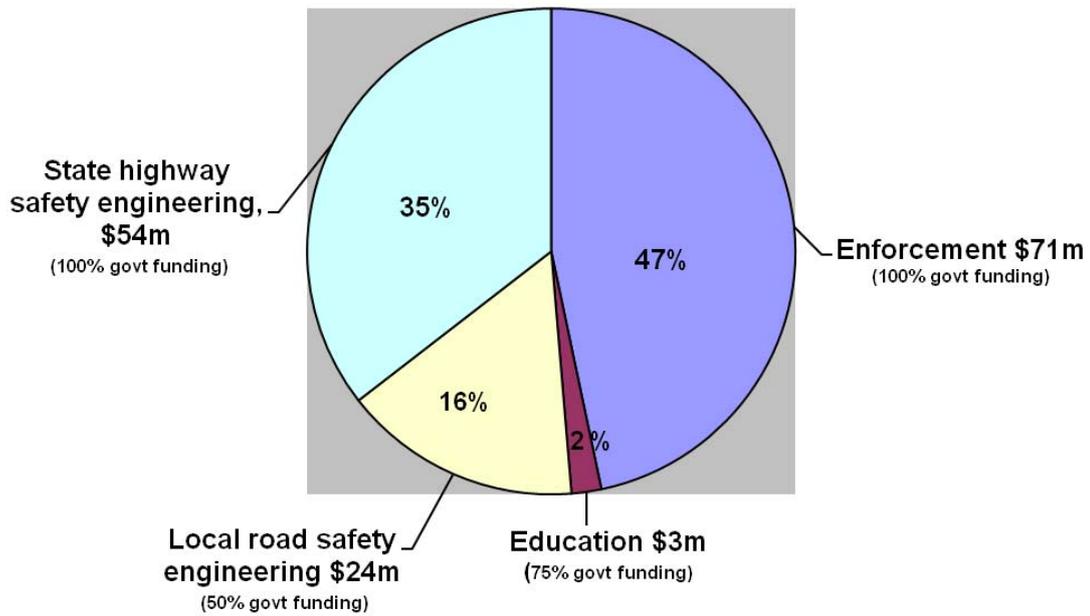
4. Engineering

Median and Edge Barriers. TRAFINZ strongly recommends a well funded engineering programme focussed on improving safety. There is no doubt that improving the road environment is a key area in reducing the road toll. The 2010 Strategy considered that such a focus would reduce the social cost of crashes by a huge amount, equating to approximately 20%. In today's terms that would be \$900 million per annum.

The cost of implementing barriers and associated passing lanes in most areas is relatively small. With programmes such as Kiwirap there is good data on key risk areas. It is absolutely clear both domestically and internationally that these interventions work when effectively targeted to higher risk areas. Even the limited lengths of new median barrier for example on SH1 in the Waikato and on Centennial Highway north of Wellington have already saved many lives. Wire rope barriers have eliminated head on collisions which were killing 7-9 people a year.

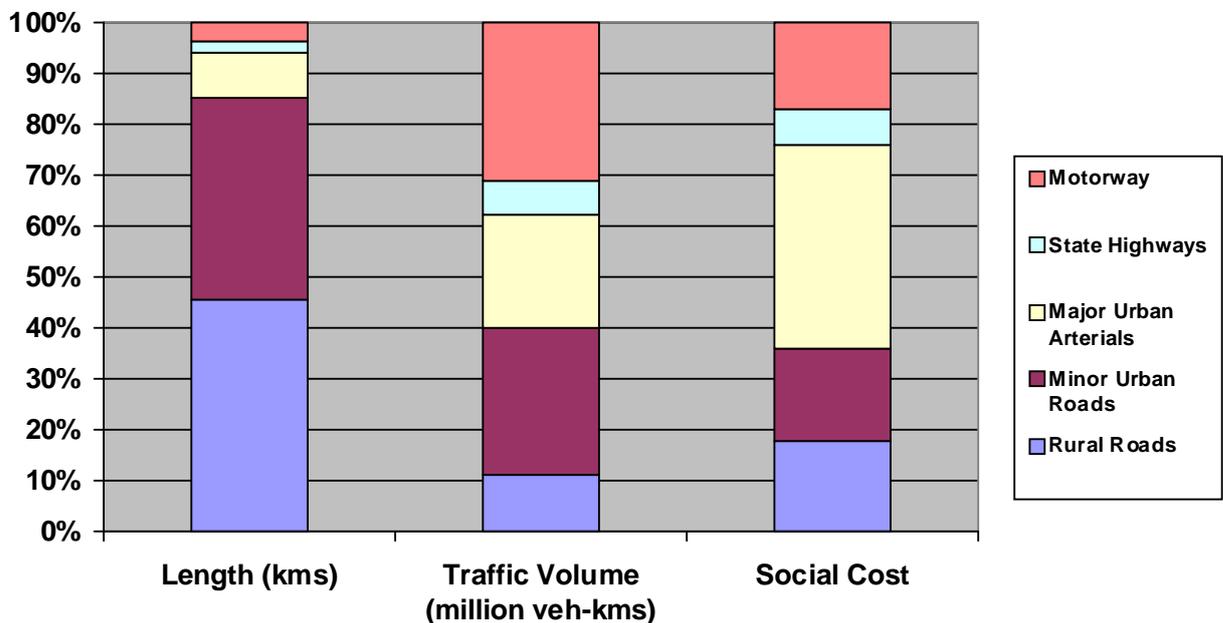
Such investment was recommended as one of three key initiatives to come out of the blue sky planning day with key government agencies following the then Government's political decision not to proceed with most of the recommendations coming out of the 'See you there safe as' consultation. Professor Ian Johnston (Monash University), in speaking at that planning day said that roadside barriers in high risk areas close to Melbourne would be one of the biggest 3 factors in reducing their road toll. At that stage there was agreement that road safety engineering would be a key focus for New Zealand as well. TRAFINZ considers that this would assist us to match the performance of leading European nations such as Sweden where such a median and edge barrier approach has been very successful. The Strategy should allocate a specific proportion of funding for such safety works. In many areas this would be completely consistent with Government's focus on RONS.

We also recommend funding is targeted to areas of greatest risk regardless of the nature of the road controlling agency (NZTA or local authority) By way of example in the Auckland region safety engineering on State Highways in 2008 (graph below) received 35% of the allocated safety funding while local roads received 16%.



However the social cost of crashes on local roads was three times that on State Highways including motorways, though the crash density on state highways was obviously much greater.

Comparison of network length, travel and social cost for Auckland Region 2007



We stress this is absolutely not an argument against investing in State Highway safety. On the contrary, TRAFINZ strongly recommends a significant increase in safety engineering. We do recommend that it is well targeted to highest risk /return areas.

5. Speed Limits

Reduced Rural and Urban Speeds. TRAFINZ strongly supports the proposed initiatives to reduce speed limits, both rural and urban, to fit the conditions. Simple physics tells us that 100kph is completely unsafe on rural roads where there is only a thin white paint line separating traffic. Some smaller roads are too narrow even for that, and 100kph is a physical impossibility on many roads where it is the legal maximum.

Urban speed limits should reflect the nature of the road and the users on that road. For example areas where there are significant numbers of pedestrians or cyclists should have speed limits aligned to human ability to survive a crash rather than to the traditional arbitrary 50kph. TRAFINZ also recommends that speed tolerance is based on 10% of the posted speed rather than 10kph. Otherwise the de facto urban speed is an unsafe 60kph. TRAFINZ consequently supports work to reduce speeds around schools including Policing at a lower tolerance threshold. We recommend this approach being extended across urban areas. We also recommend speed limits being reduced further. Increasingly communities are calling for specific (reduced) speed limits on roads of all classes for safety reasons. A review to streamline the process for setting speed limits should also be considered. However speed limits should be appropriate to the nature and use of roads.

6. Self Explaining Roads

TRAFINZ strongly supports 'self explaining roads' and differentiating between roads which are principally for moving through, and those which are principally for people. This is particularly challenging as most of our small towns and urban retail centres have their main streets bisected by state highways or major arterials. Careful case by case work by road controlling authorities should be encouraged to manage these conflicts as best is possible. Appropriate speed limits and associated engineering and street environment work are required.

7. Alcohol

TRAFINZ supports the reduction in BAC to 0.05 in line with most other OECD nations. Ideally we consider a lower level of 0.02 would be preferable. We also support the other proposed initiatives especially zero BAC for learner drivers and recidivist offenders. We also recommend commercial drivers be required to have zero alcohol levels, especially those in passenger transport and heavy transport.

TRAFINZ also notes the current separate but linked review of the age of alcohol availability. TRAFINZ strongly supports an increase in the age at which young people can legally purchase alcohol.

These initiatives should be accompanied by education as to acceptable drinking levels, and possibly self testing arrangements. For many years Government advertising has taught that 'if you drink and drive you're a bloody idiot' yet the legal BAC teaches that it is acceptable to drink to a significant level, and then drive. This contradiction needs to be resolved by reducing the BAC.

8. Motorcycling

TRAFINZ agrees that this is a high risk area and a growing contributor to death and injury on our road. There should be a focus on safety training. TRAFINZ conference delegates were particularly keen to see high visibility protective clothing promoted, and ACC levies being much more reflective of risk. Should the latter be adopted we recommend levies be linked to power rather than the more simplistic engine size approach.

9. Safer Vehicles

TRAFINZ strongly supports promoting the uptake of safer vehicles. Government has a key role here particularly through import standards and fleet purchasing decisions. There are significant benefits to be obtained through fleet purchasing policies, improved vehicle impact and pedestrian safety standards, and actively addressing the growing divergence in vehicle sizes (if this is not already being assisted by fuel prices).

10. Land Use Planning

TRAFINZ considers that land use planning is an important long term contributor to safer journeys. Safety should be integrated into land use planning. TRAFINZ will contribute to the current review of subdivision design guides, which we welcome. The location of roads and purpose(s) of roads are also important as set out in our discussion of self explaining roads. In urban areas in particular, urban form has a significant role to play. More walkable, public transport friendly cities are not only going to be cheaper to operate, and more sustainable, but will also be safer.

11. Cycling

Cycling is being encouraged for tourism purposes. While there has been a decline in recent years a rebound seems in evidence (MOT 'Raising the Profile of Walking and Cycling in New Zealand 2008) TRAFINZ has good connections to cycling groups, and access to local data. In our view there is clearly significant, in some areas quite dramatic growth of recreational cycling. There is also some significant growth apparent in some cities (eg Wellington) for commuting purposes. However the number of children cycling (and walking) to school has declined significantly over the last twenty years and this is a real concern for health and social development reasons, to say nothing of transport impacts. The problem with cycling is that it is also frequently highly risky. For the most part this is because of almost complete lack of safe infrastructure. We are sure that this is holding back latent mode shift potential. TRAFINZ

recommends that the 2020 Strategy include working with local government to develop safe networks of cycling facilities in key areas, or areas that should be key areas. The journey to school is particularly important. Funding will be required.

12. Child restraints

TRAFINZ particularly supports the proposed initiatives to encourage correct use of child restraints and to increase the age up to which use of child restraints is required. Approximately 3 children a year die because they are using adult seat belts rather than being in child restraints. Deaths and serious injuries for children could be reduced through reviewing upward the age at which child seats are mandatory. New Zealand's current mandatory age is 5. TRAFINZ understands that Australia is moving to 9, and that many other leading jurisdictions adopt as high as 12 years. This is based on physiology and the size of children in relation to the heights of seat belts. Children that are too small (c 148 cm which equates approximately to 12 years) are likely to be injured or even killed in a crash by the seat belt because they are likely to slip under the cross chest belt or suffer neck damage from it.

13. Road safety education

TRAFINZ has no difficulty with the Government reviewing the impacts of road safety, but strongly recommend this be a very open process. However we do question why this was the one transport area selected for such a review. The Government seems to have a view that non core curriculum education is of dubious value, whether road safety, enviro-schools, or adult education. We strongly disagree.

There is no doubt in our minds that road safety professionals employed by Councils have contributed significantly to road safety, and done so in a creative way that often accesses a significant amount of private sector resourcing. Furthermore TRAFINZ suggests that a nationally co-ordinated compulsory road safety education programme be part of the primary and secondary school curriculum. At present this is left largely to chance and is erratically delivered.

By way of example Auckland City Council, like many other Councils, have a community education team which undertakes a number of critical community engagement and education functions including setting up walking school buses (more than 3,300 children currently participating) cycling education programmes and working closely with schools to determine safe travel options to and from school. These activities support engineering measures through encouragement and education initiatives as part of school travel plans. An evaluation of the school travel plans at ten schools in Auckland City was undertaken, and showed:

- Total pedestrian and cycle crashes reduced by 11 percent
- Child pedestrian and cycle crashes reduced by 48 percent
- A reduction of social cost of \$15.7 million was achieved
- All this occurred as 6 percent less school attendees were driven to school

Experience in the United Kingdom has also shown that their Walk and Wise programme (similar to Walking School Bus programme) resulted in an estimated reduction of 36 percent in target group casualties.

Another example of this is the community-based Repeat Drink Driver Brief Intervention Programme, which has reduced re-offending rates of participants in the Auckland region to 14 percent, compared with a national reoffending rate of 54 percent. The assessed benefit cost ratio is 20:1.

An assessment undertaken by Land Transport Safety Authority in 2000 of the then Safety Administration Programme (SAP) showed that when SAP enforcement, advertising and community programmes were packaged together they delivered an overall benefit cost ratio of between 8:1 and 13:1, as outlined in the Auckland Regional Road Safety Plan 2009/12. Importantly Community programmes were identified as 'Type VI Long-term projects' that produce safety culture benefits over a long period when delivered in accordance with best practice criteria, Government and agency goals, and with expert evaluation and audits.

Community programmes are well embedded in the local community and are directed and targeted to high risk behaviours and target groups that have been identified by those communities. These programmes are able to support and work with engineering and enforcement interventions.

International research also supports this view. An example is The Handbook of Road Safety Measures - Rune Elvik 2004. Similarly the World Bank Global Road Safety Facility highlights the importance of establishing long term road safety education initiatives. This is particularly the case with young people and children. TRAFINZ sees the development of a road safety culture as vital.

14. Review the crash analysis system (CAS)

TRAFINZ recommends a review to achieve more comprehensive view of crash causes. Multiple causes should be recorded including all those related to the system rather than the driver. For example the absence of edge or median barriers should be noted in preventing 'vehicle left road' or head on crashes. We suggested that a strategic review team be tasked to undertake a macro view of crashes to identify key cause factors.

We believe that analysis of all fatal and ideally serious injury (potentially fatal) crashes should be conducted by an independent review team similar to the Air Accident Commission or Maritime Safety Authority. Using all the data recorded by the Serious Crash Units from the Police, this team would then be able to understand the multiple causes of the crash including all those related to the system rather than the driver.

Serious crash information should be passed to relevant system owners (eg road controlling authorities) and a response required as to actions planned. There is also a serious anomaly in the way injuries are recorded. That is the range from

nil, minor, serious to fatal is flawed. A serious injury could range from a broken arm involving minimal cost through to paraplegia incurring a lifetime of heavy cost. Many of our decisions are based on social cost estimates are taken from CAS injury levels. These levels are clearly overly simplistic.

15. Penalty Regimes

TRAFINZ encourages an ongoing review of penalty regimes and guidance so that penalties best fit the impacts of poor driving behaviours, and show a higher degree of consistency. These may be demerit, monetary, or non monetary penalties. Penalties must impose meaningful consequences on drivers to maximise the potential behaviour change sought.

There are two particular initiatives, the merits of which TRAFINZ recognises are debated.

1. Compulsory third party insurance

This has been assessed in detail recently by the Ministry. We understand there are significant costs and fishhooks involved. Balancing this would be the potential benefit in removing some particularly troublesome drivers from the road. TRAFINZ does not feel in a position to comment on the value of this initiative.

2. Making driving fatigued an offence

TRAFINZ agrees that fatigue is a real safety issue. The concern is how this initiative could be implemented in a fair and legal fashion. The current offence of careless driving could adequately address this area.

Finally we wish to comment on two other aspects.

1. Red light cameras

Red light running is endemic in New Zealand. TRAFINZ has long advocated for the ability to install red light cameras with a workable funding and enforcement model behind them. We look forward to the completion of the current Auckland City trial of red light cameras and the subsequent ability of road controlling authorities to roll out this technology in a way that enforcement revenue covers the costs to road controlling authorities.

2. Creative Culture

TRAFINZ considers that Government processes should be more encouraging of creative approaches rather than the 'one size fits all' mentality. It has been encouraging in recent years to see greater use of 'trials' to test new initiatives. There is an element of 'if it works – do it' (an outcome approach) that we have observed in overseas jurisdictions which seems superior to the New Zealand model of requiring rules to be met (input approach). Excessive regulation may prevent safety improvements or require sub optimal actions.

3. Road Safety Policing

TRAFINZ assumes that the importance of existing investment in road safety policing is a given. New Zealand has relied very heavily on road safety policing in reducing road trauma since the 1980s. Benefit cost ratios are estimated in the range of 8:1 to 13:1. TRAFINZ strongly supports the continuation of road safety policing.

Conclusion

TRAFINZ appreciates the opportunity to provide input to the *Safer Journeys* discussion document. We would be delighted to discuss the points we have made further, and look forward to working together to help implement a visionary, courageous approach to road safety over the next decade. This discussion document marks a critical opportunity to decide to do something serious about reducing the number of people killed and seriously injured on our roads. It will take courage and leadership.

Yours sincerely,

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